

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 7
)	
JOHNSON PUBLISHING COMPANY LLC)	Case No. 19-10236
)	
Debtor.)	Hon. Jack B. Schmetterer

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **Tuesday, March 31, 2020 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned shall appear telephonically before the Honorable Jack B. Schmetterer, or such other judge as may be sitting in his place and stead in Courtroom 682 of the Dirksen Federal Building, 219 S. Dearborn, Chicago, IL and shall present the attached **Trustee's Motion for Substitution of Counsel**, at which time and place you may appear telephonically if you see fit. A copy of the motion is attached hereto and is herewith served upon you.

Pursuant to Amended General Order No. 20-03, any party who objects to this motion and wants it to be called must file a Notice of Objection no later than two (2) business days before the presentment date. If no Notice of Objection is timely filed, the Court may grant the motion without a hearing before the date of presentment.

Dated: March 23, 2020

Respectfully submitted,

Miriam R. Stein, as Chapter 7 Trustee for the Estate
of Johnson Publishing Company LLC

By: /s/ Miriam R. Stein

Miriam R. Stein (6238163)
Gutnicki LLP
4711 Golf Road, Suite 200
Skokie, IL 60076
(847) 745-6592
mstein@gutnicki.com

CERTIFICATE OF SERVICE

I, Miriam R. Stein, an attorney, hereby certifies that I sent a copy of this Notice and attached Motion to the individuals listed below by service via the Court's CM/ECF electronic notice system on March 23, 2020, or by other means as specified on the Service List.

/s/ Miriam R. Stein

SERVICE LIST

Howard L. Adelman hla@ag-ltd.com, dbaird@ag-ltd.com
Sarah K Angelino sangelino@schiffhardin.com, edocket@schiffhardin.com
Heather L Blaise hblaise@blaisenitschkelaw.com, heather.blaise@gmail.com; samanthab@blaisenitschkelaw.com; docket@blaisenitschkelaw.com
Steven B Chaiken schaiken@ag-ltd.com, aweir@ag-ltd.com
Daniel A Cohen dcohen@wmhlaw.com
Michael R Collins michael.collins@collinsandcollins.com, eric.anderson@collinsandcollins.com
David R Doyle ddoyle@foxrothschild.com, kjanecki@foxrothschild.com
William J Factor wfactor@wfactorlaw.com, wfactorlaw@gmail.com; bharlow@wfactorlaw.com; wfactor@ecf.inforuptcy.com; wfactormyecfmail@gmail.com; factorwr43923@notify.bestcase.com
J Mark Fisher mfisher@schiffhardin.com, edocket@schiffhardin.com; sricciardi@schiffhardin.com
John M George jgeorge@kattentemple.com, kbuzzard@kattentemple.com, acorona@kattentemple.com
Jeffrey B Greenspan jgreenspan@cozen.com, trodriguez@cozen.com
Timothy W Hoffmann thoffmann@jonesday.com
Christopher J. Horvay chorvay@sfgf.com, mmelickian@sfgf.com; chorvay@sfgf.com; joconnor@sfgf.com; mbrandess@sfgf.com; bkdoCKET@sfgf.com
Mason W Kienzle mkienzle@kattentemple.com, kbuzzard@kattentemple.com, acorona@kattentemple.com
Randall Klein randall.klein@goldbergkohn.com, amy.halpin@goldbergkohn.com
James J Ktsanes james.ktsanes@lw.com
Patrick S Layng USTPRegion11.ES.ECF@usdoj.gov
Michael Leifman mleifman@chuhak.com
David M Madden dmadden@sfgf.com, bkdoCKET@sfgf.com
Ha M Nguyen ha.nguyen@usdoj.gov, USTP.region11.es.ecf@usdoj.gov
Felicia Gerber Perlman fperlman@skadden.com, chdoCKET@skadden.com; mark.campana@skadden.com
N. Neville Reid nreid@foxswibel.com, bkdoCKET@foxswibel.com
Elizabeth E Richert erichert@crottylaw.com, docket@crottylaw.com; dmueller@crottylaw.com
Ryan T Schultz rschultz@foxswibel.com, bkdoCKET@fslc.com
Jeffrey M Schwartz jschwartz@muchshelist.com, wballinger@muchlaw.com
Charles S. Stahl, Jr. cstahl@smbtrials.com
Miriam R Stein mstein@gutnicki.com
Steven L Vanderporten svanderporten@foxswibel.com, bkdoCKET@foxswibel.com
Frank Venis frankpaulvenis@yahoo.com, venis@venisandcopp.com
Brian Wilson ewatts@foxswibel.com, bkdoCKET@foxswibel.com

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MOTION FOR SUBSTITUTION OF ATTORNEYS

Miriam R. Stein, not individually but solely as the Chapter 7 Trustee (“Trustee”) for the Estate of Johnson Publishing Company LLC (the “Debtor”) hereby moves (the “Motion”) for entry of an Order pursuant to Rule 2091-1 of the Local Rules for the Northern District of Illinois authorizing the substitution of Miriam R. Stein and the law firm of Gutnicki LLP as special counsel to the Trustee. In support of this Motion, the Trustee respectfully states as follows:

1. Prior to March 1, 2020, the Trustee was represented as special counsel by the law firm of Chuhak & Tecson P.C. (“Chuhak”).
2. On March 1, 2020, Miriam R. Stein became affiliated as Of Counsel to the firm of Gutnicki LLP (“Gutnicki”), having previously been affiliated with Chuhak. While at Chuhak, Ms. Stein and the Chuhak firm was retained as special counsel to the Trustee in connection with claims review and prosecution and litigation related services as needed.
3. The Trustee desires to have Ms. Stein and the law firm of Gutnicki to continue to represent her in this case.
4. Pursuant to the amended Affidavit of Ms. Stein, Gutnicki is experienced in bankruptcy and litigation matters and well qualified to represent the Trustee as special counsel. Gutnicki has no connections with the Debtor, creditors or any other party in interest, their

respective attorneys and/or accountants. Thus, Gutnicki is a “disinterested person” within the meaning of that term as used in 11 U.S.C. §327(a) and as defined at 11 U.S.C. §101(14).

5. Section 328(a) of the Bankruptcy Code permits a trustee to retain special counsel on an hourly fee basis. The fee structure at Gutnicki is comparable to the rates previously approved for Chuhak. The hourly rates at Gutnicki range from \$400/hour to \$535 per hour for partners (and of counsel attorneys); \$235 to \$360 per hour for associates and \$125 to \$205 per hour for paralegals (depending on level of expertise).

6. The payment of attorney’s fees shall be made upon further petition to this Court based upon the compensation structure approved herein.

7. The Trustee requests that Gutnicki’s retention as special counsel and the substitution of counsel be approved effective as of March 1, 2020.

8. Accordingly, the Trustee respectfully requests that this Court enter an Order authorizing the substitution of Miriam R. Stein and the law firm of Gutnicki has her special counsel.

WHEREFORE, the Trustee respectfully requests that this Court enter an Order:

- A. Authorizing the substitution of Miriam R. Stein and the law firm of Gutnicki LLP as special counsel to the Trustee, effective as of March 1, 2020;
- B. Approving the retention of Gutnicki LLP as special counsel effective as of March 1, 2020; and
- C. Granting such other relief as this Court may deem just and proper.

Dated: March 23, 2020

Respectfully submitted,

Miriam R. Stein, as Chapter 7 Trustee for the Estate
of Johnson Publishing Company LLC

By: /s/ Miriam R. Stein

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